

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT T. BROCKMAN,

Defendant.

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§ **Cr. No. 4:21cr 009 GCH**
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UNITED STATES' EXHIBIT LIST FOR COMPETENCY HEARING

| Exhibit No. | Description | Identifier |
|--------------------|--|--------------------------------|
| 1 | Forensic Neuropsychological Report, Dr. Robert Denney | DBD-0000127 to DBD-0000164 |
| 2 | Dr. Denney Supplemental Report | |
| 3 | Dietz/Denney Exam Video- Day 1 | |
| 4 | Dietz/Denney Exam Video- Day 3 | |
| 5 | Dietz/Denney Exam Video Transcripts Days 1 & 3 | |
| 6 | Letter Report, Dr. Maria Ponisio re 3/12/2021 PET Scan | DMP-000007 to DMP-0000011 |
| 7 | Letter Report, Dr. Maria Ponisio re 7/28/2021 PET Scan | DMP-0000001 to DMP-0000006 |
| 8 | Letter Report, Dr. Maria Ponisio re 8/24/2021 PET Scan | DMP-0000012 to DMP-0000016 |
| 9 | Evatt Tamine Performance Review, 2/5/2010 | ET_0000019742 to ET_0000019745 |
| 10 | Email Exchange, Robert Brockman and Evatt Tamine, 9/2/2010 | ET_0000044709 to ET_0000044710 |
| 11 | Email from Brockman to Tamine, | ET_0000058894 |

| Exhibit No. | Description | Identifier |
|-------------|---|---|
| | 11/21/2013 | |
| 12 | Tamine Performance Review, 6/4/2017 | MLATSW_020987 to MLATSW_020995 |
| 13 | Charitable Contributions List | N.D. Cal Dkt. No. 69-10 |
| 14 | Email between Brockman and Tamine, 5/21/2011 | ET_0001791710 |
| 15 | Email between Brockman and Tamine, 6/4/2011 | ET_0001791784 |
| 16 | Letter from Tamine to Dr. Stuart Yudofsky, 6/5/2011 | ET_0001694180 to ET_0001694185 |
| 17 | Email from Brockman to Tamine, 8/13/2017 | MLATSW_020952 |
| 18 | Tamine Memo re: Frozen Accts, 7/29/2017 | MLATSW_020907 to MLATSW_020911 |
| 19 | Email from Brockman to Tamine, 6/12/2011 | MLATSW_002276 |
| 20 | Letter from Tamine to Brockman | ET_0001694884 to ET_0001694886 |
| 21 | Email from Brockman to Tamine, 8/1/2015 | MLATSW_015369 |
| 22 | Email from Tamine to Brockman 8/21/2017 | MLATSW_020978 |
| 23 | Emails between Tamine and Brockman 7/26/2017 | MLATSW_020867 |
| 24 | Emails between Tamine and Brockman 6/20/2015 | MLATSW_015263 to MLATSW_015265 |
| 25 | Email from Tamine to Brockman 3/4/2014 | MLATSW_006702 |
| 26 | Email from Brockman to Tamine and Don Jones 7/23/2008 | ET_0000015153 |
| 27 | Email from Tamine to Yudofsky, 8/13/2015 | ET_0002071945 |
| 28 | Subpoena to Vista | Attached |
| 29 | Alaskan Trip Itinerary | SOL-0000584 |
| 30 | MLAT Request, 11/8/2018 | |
| 31 | Chain of Custody Documents | Attached |
| 32 | FTC Hearing Transcript, Vol. 1, 9/18/2019 | FTC-0000001 to FTC-0000110 |
| 33 | FTC Hearing Transcript, Vol. 2, 9/19/2019 | FTC-0000111 to FTC-0000202 |
| 34 | FTC Hearing Exhibits, Vol. 1 | FTC-0000472 to FTC-0000486; FTC-0000297 to FTC-0000299; FTC-0000316 to FTC-0000317; |

| Exhibit No. | Description | Identifier |
|-------------|---|--|
| | | FTC-0000487; FTC-0000300 to FTC-0000303; FTC-0000294 to FTC-0000296; FTC-0000304 to FTC-000305 |
| 35 | FTC Hearing Exhibits, Vol. 2 | FTC-0000292 to FTC-0000293; FTC-0000306 to FTC-0000311; FTC-0000432 to FTC-0000442; FTC-0000331 to FTC-0000356; FTC-0000357 to FTC-0000422; FTC-0000318 to FTC-0000330; FTC-0000423 to FTC-0000427; FTC-0000428 to FTC-0000431; FTC-0000312 to FTC-0000315; FTC-0000446 to FTC-0000469; FTC-0000443 to FTC-0000445; FTC-0000470 to FTC-0000471 |
| 36 | Brockman Deposition Transcript, 1/16/2019 | FTC-0000970 to FTC-0001048 |
| 37 | Brockman Deposition Transcript, 1/17/2019 | FTC-0001253 to FTC-0001354 |
| 38 | Letter Report, Dr. Ryan Darby, 6/18/2021 | DRD-0000009 to FTC-0000023 |
| 39 | Darby Supplemental Report | |
| 40 | Examination Video, Dr. Ryan Darby | DRD-0000003 to DRD-0000005 |
| 41 | Polysomnography Report (Sleep Study), 4/29/2021 | MHH-0000001 to MHH-0000007 |
| 42 | Titration Report (Sleep Study), 8/12/2021 | MHH-0000008 to MHH-0000019 |
| 43 | PET Scan Reports, Dr. Ryan Darby | |
| 44 | Email from Brockman to Bart Chandler, 6/27/2020 | UCSH_0229197 |
| 45 | Email from Brockman to Passmore, July 31, 2020 | UCSH_0229391 |
| 46 | Email from Brockman to Cyndi Slade | UCSH_0229417 to UCSH_0229418 |
| 47 | Email from Brockman to Passmore, | UCSH_0229970 |

| Exhibit No. | Description | Identifier |
|-------------|---|--|
| | 10/10/2020 | |
| 48 | Email from Brockman to Slade, 8/10/2020 | UCSH_0229464 to UCSH_0229465 |
| 49 | Email from Brockman re Alaska Itinerary, 8/27/2018 | UCSH_0219578 to UCSH_0219579 |
| 50 | Email from Brockman to Lerner, 9/6/2018 | UCSH_0219722 |
| 51 | Email exchange between Brockman and Moss, 7/30/2020 | UCSH_0229389 |
| 52 | DCS Board Resolution, 8/13/2020 | UCSH_0229512 to UCSH_0229526 |
| 53 | Memo from Brockman to Nalley, 5/10/2020 | UCSH_0228641 to UCSH_0228644 |
| 54 | Email exchange between Brockman and Arnett, 6/3/2020 | UCSH_0228917 to UCSH_0228919 |
| 55 | Email exchange between Brockman and Barras, 2/13/2020 | UCSH_0227075 to UCSH_0227076 |
| 56 | Email exchange between Brockman and Barras, 3/1/2020 | UCSH_0227291 to UCSH_0227294 |
| 57 | Email exchange between Brockman and Barras, 6/3/2020 | UCSH_0228922 |
| 58 | Brockman Deposition Video, Kellogg Hansen 1/16/2019 | FTC-0001735, FTC-0001667, FTC-0001673, |
| 59 | Brockman Deposition Video, Kellogg Hansen 1/17/2019 | FTC-0001786, FTC-0001785, FTC-0001873, FTC-0001872 |
| 60 | Transcript, Deposition of Norman Barras, April 15, 2021 | CAM-0000702 to CAM-0001081 |
| 61 | Jones Day Privilege Log (Redacted) | |
| 62 | Email exchange between Brockman and Passmore, 9/25/2018 | DPS-0011895 to DPS-0011897 |
| 63 | Email from Brockman to Moss, 12/16/2018 | UCSH 0221292 |
| 64 | Email from Brockman to Burnett 4/1/2020 | RB-00006827 to RB-00006829 |
| 65 | Emails between Brockman and Burnett 5/6/2020 | RB-00010023 to RB-00010024 |
| 66 | Email from Barras to Burnett 10/1/2020 | RB-00010321 |
| 67 | Email from Brockman to Moss 10/14/2018 | CM-00023194 |
| 68 | Email from Brockman to Moss 1/2/2020 | CM-00027155 to CM-27232 |

| Exhibit No. | Description | Identifier |
|--------------------|---|-----------------------------------|
| 69 | Email from Brockman to Moss 5/11/2020 | CM-00028695 |
| 70 | Email from Brockman to Moss 11/13/2020 | CM-00029368 |
| 71 | Email from Brockman to Moss, 10/21/2019 | CM-00026581 |
| 72 | Email from Brockman to Moss, 4/17/2020 | CM-00028469 |
| 73 | Email from Barras to Moss, 8/14/2020 | CM-00016846 |
| 74 | Memo from Brockman to Moss, 10/5/2020 | CM-00029267 |
| 75 | Email exchange between Barras and Moss, 10/20/2020 | CM-00006180 to CM-00006181 |
| 76 | Jones Day Privilege Log (Unredacted) | |
| 77 | Video, Brockman Reynolds & Reynolds Speech, 2019 | UCSH 0212042 |
| 78 | Declaration of Kathryn Keneally, 12/8/2020 | N.D. Cal. Dkt. No. 64-1 |
| 79 | Declaration of Peter Romatowski | N.D. Cal. Dkt. No. 64-3 |
| 80 | Request for Medical Discovery, 11/19/2020 | |
| 81 | Taxpayer Conference Letter 4/9/2020 | |
| 82 | Taxpayer Conference Letter Exhibits | |
| 83 | Dr. Dietz Report | PDA-0000025 to PDA-0000069 |
| 84 | Dr. Dietz Supp. Report | |
| 85 | Dr. James L. Pool, Examination Notes, 6/14/2021 | RTBrockman_Medical_Records0005409 |
| 86 | Dr. Ponisio 10/25/21 Report | |
| 87 | Tamine Immunity Agreement | |
| 88 | Dr. Dietz Second Supplemental Report | PDA-0000353 to PDA-0000372 |
| 89 | Video of Guilmette Exam (July) | |
| 90 | Transcript of Guilmette Exam (July) | |
| 91 | Video of Agronin Exam (July) | |
| 92 | Transcript of Agronin Exam (July) | |
| 93 | Video of Dietz and Denney Exam (October) | |
| 94 | Transcript of Dietz and Denney Exam (October) | PDA-0000314 to PDA-0000352 |
| 95 | Records of Dr. Scott Lisse | |
| 96 | Subpoena to Al Deaton | |
| 97 | 9/18/16 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000352 |

| Exhibit No. | Description | Identifier |
|--------------------|--|----------------------------|
| | | |
| 98 | 9/19/16 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000035 0001 |
| 99 | 12/2/16 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000808 |
| 100 | 2/28/17 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000784 |
| 101 | 3/22/17 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000644 |
| 102 | 5/3/17 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000277 |
| 103 | 5/3/17 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000621 |
| 104 | 5/3/17 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000034 0001 |
| 105 | 5/18/17 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000617 |
| 106 | 5/20/17 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000616 |
| 107 | 5/23/17 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000614 UNREDACTED |
| 108 | 10/11/17 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000033 0001 |
| 109 | 10/12/17 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000030 0001 |
| 110 | 10/12/17 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000032 0001 |
| 111 | 10/12/17 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000031 0001 |
| 112 | 5/26/18 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000564 UNREDACTED |
| 113 | 1/20/19 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000024 0001 |
| 114 | 3/6/19 Email Exchange between Dr. Yudofsky and Defendant | YUDOFSKY-000040 0001 |
| 115 | Email from Defendant to Passmore 10/9/19 | UCSH 0225102 |
| 116 | Dec. 2018 Reynolds & Reynolds Video | UCSH 0210542 |
| 117 | Form 8275 Disclosure | |
| 118 | Letter from Charles Rettig to IRS, May 13, 2015 | |

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ATTORNEY GENERAL

s/ Corey J. Smith

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